

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	
)	Criminal No. 24-cr-10270-RGS
SAM BHAMBHANI and)	
MAXIM TESLENKO,)	
)	
Defendants.)	

JOINT STATUS MEMORANDUM

The United States of America, with the assent of the defendant, hereby submits this memorandum addressing Local Rule 116.5(c). The parties have reviewed this memorandum and agree to its contents. The parties respectfully ask that the August 12, 2025 status conference be cancelled and the case referred to the District Court for a pretrial conference.

I. Production of Discovery and Timing of Additional Discovery to be Produced.

The government has produced automatic discovery to the defendant. The government will provide discovery in response to any future request(s) according to the Local Rules and the Federal Rules of Criminal Procedure, including any supplemental discovery if additional materials are obtained.

II. Timing of Additional Discovery Requests.

There are no outstanding requests or motions for discovery. The parties reserve the right to make further discovery requests or motions.

III. Pretrial Motions Under FRCP 12(b).

No motions have been filed under Fed. R. Crim P. 12(b). The parties reserve the right to file such motions.

IV. Speedy Trial Calculations.

The parties agree that the time between August 12, 2025 and the pretrial conference date before the District Court be excluded. This period constitutes “the reasonable time necessary for effective preparation, taking into account the exercise of due diligence,” 18 U.S.C. § 3161(h)(7)(B)(iv), and the parties request that this Court find that the ends of justice served by excluding the period of this continuance outweigh the best interest of the public and the defendant in a speedy trial, pursuant to 18 U.S.C. § 3161(h)(7)(A).

V. Length of Trial.

The parties estimate four to five days for trial.

Respectfully submitted,

LEAH B. FOLEY
United States Attorney

By: /s/ Timothy H. Kistner
Timothy Kistner
Assistant U.S. Attorney

Dated: August 11, 2025

CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and that paper copies will be sent to those indicated as non-registered participants on this date.

/s/ Timothy H. Kistner
Timothy H. Kistner
Assistant U.S. Attorneys